

EXHIBIT H

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL) MDL No. 2804
5 PRESCRIPTION OPIATE)
6 LITIGATION) Case No.

) 1:17-MD-2804

7)
8 THIS DOCUMENT RELATES TO) Hon. Dan A. Polster
9 ALL CASES)
10)

11 — — —
12 Friday, December 14, 2018
13 — — —

14 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
15 CONFIDENTIALITY REVIEW
16 — — —

17 Videotaped Deposition of PATSY LITTLE,
18 held at Stone Pigman Walther Wittmann LLC,
19 909 Poydras, Suite 3150, New Orleans,
20 Louisiana, commencing at 8:06 a.m., on the
21 above date, before Michael E. Miller, Fellow
22 of the Academy of Professional Reporters,
23 Registered Diplomat Reporter, Certified
24 Realtime Reporter and Notary Public.

25 — — —
26 GOLKOW LITIGATION SERVICES
27 877.370.3377 ph | 917.591.5672 fax
28 deps@golkow.com

1 will now swear in the witness.

2 PATSY LITTLE,

3 having been duly sworn,

4 testified as follows:

5 EXAMINATION

6 BY MR. BOWER:

7 Q. Good morning, Ms. Little. How
8 are you today?

9 A. Good morning. Great.

10 Q. Thank you for being here. We
11 appreciate it.

12 Have you ever been deposed
13 before?

14 A. I have not.

15 Q. You have not, okay. So I'm
16 sure your counsel went over a few ground
17 rules for you, but just so we're all on the
18 same page, let's talk about that for a
19 minute.

20 I need you to answer if it's a
21 yes-or-no question verbally, so in other
22 words, don't nod your head, so the court
23 reporter can take down your answer. Do you
24 understand that?

25 A. Yes, I do.

1 After Hours, which was an acute care setting.

2 I worked at St. Elizabeth Hospital and I
3 worked for Infusion Network.

4 Q. Okay. Thank you for that.

5 Then in 2005 you went to
6 Louisiana State to get your master's degree,
7 correct?

8 A. That's correct.

9 Q. Did you begin working with
10 Walmart directly after graduating with your
11 master's degree?

12 A. About six or seven months
13 later.

14 Q. And what were you hired at
15 Walmart to do?

16 A. To be a buyer in the pharmacy
17 department.

18 Q. In 2008 when you began at
19 Walmart, did you have any specific areas
20 of -- that you were responsible for buying?

21 A. Yes.

22 Q. Okay. What were those areas?

23 A. I don't remember exactly. I
24 know skin health, antibiotics, and I don't
25 really remember the others.

1 Q. Okay. When did you first have
2 responsibility for buying prescription
3 opiates?

4 A. It would have been maybe a year
5 later, a year and a half later, something
6 like that.

7 Q. So sometime in the 2009 time
8 frame?

9 A. Yes.

10 Q. Okay.

11 A. Probably.

12 Q. And at that time, Walmart was
13 already purchasing prescription opiates,
14 correct?

15 A. That's correct.

16 Q. And Walmart was already
17 distributing prescription opiates; is that
18 correct?

19 A. That's correct.

20 Q. Do you have any idea when
21 Walmart began distributing prescription
22 opiates?

23 A. I do not.

24 Q. What change occurred, if any,
25 between the time you began at Walmart and the

1 recollection.

2 A. Okay.

3 Q. Okay? And then how long did
4 you purchase prescription opiates for
5 Walmart?

6 A. On and off between that 2009
7 time frame until maybe '16 or '17.

8 Q. So almost through the time you
9 left Walmart, correct?

10 A. Yes. There were some time
11 frames in there that I did not -- a different
12 buyer, another buyer had that responsibility.

13 Q. Can you explain how that works?
14 Why would one buyer come in and have that
15 responsibility and you would not have
16 responsibility?

17 A. It was just changes that they
18 made often to give you experience, or a new
19 buyer came in and they changed the
20 categories. I'm not sure that there was any
21 set reason for that.

22 Q. Okay. During your time period,
23 what other buyers had responsibility for
24 purchasing prescription opiates?

25 A. I know Steve Potts.

1 MR. CIULLO: Objection, form.

2 MS. FUMERTON: Objection, form.

3 A. If that had happened, it
4 wouldn't be for marketing to a consumer
5 level. It would really just be a rebate or a
6 cost of good adjustment.

7 BY MR. BOWER:

8 Q. What's your basis for that
9 statement?

10 A. Because we never did anything
11 that would promote an opioid to the customer,
12 to the end customer user, the patient that
13 would pick up the prescription.

14 Q. And how do you know that?

15 A. Because we had a pretty firm
16 stance on that while I was there.

17 Q. And where did you learn of that
18 stance?

19 A. I had asked to put a cough
20 medicine on the \$4 program at one time and
21 was told that anything with controlled
22 substances, we generally would not advertise
23 or talk to the consumer about.

24 Q. Would you talk to your
25 pharmacists about those prescription opiates?